Evarts, Sara

From: Bosworth, Martha <bosworth.martha@epa.gov>
Sent: Thursday, November 07, 2013 11:24 AM
To: Hornok, Gerald; Kelly.John.F@westonsolutions.com; Imbres, Carolyn
Cc: Smith, Nancy
Subject: FW: Jard Company - Response to Regional Questions
Attachments: Jard Questions_11072013.pdf; Response to Region Questions - draft - 11072013.docx

Here the response I got from Tanya.

No need to make a trip up to Vermont.

From: Tanya M Amme [mailto:tamme2@csc.com]
Sent: Thursday, November 07, 2013 10:58 AM
To: Bosworth, Martha
Cc: Jeng, Terry; Smith, Nancy; lmeador@mindspring.com; Thomas Moore; wchantry@csc.com
Subject: Jard Company - Response to Regional Questions

Dear Martha,

Please find CSC's response to the questions submitted with the Jard Company, Inc. 1st submission HRS Package. We would be happy to schedule a call if you would like further clarification. However, as we have not yet finished our initial quality assurance review of the package, we are not, at this time, prepared to discuss site issues other than the ones presented in these questions.

Please note that I have also attached a scan of the hard copy questions we received for easier reference.

Sincerely,

TANYA M. AMME
Environmental Scientist
CSC

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(See attached file: Jard Questions_11072013.pdf)(See attached file: Response to Region Questions - draft - 11072013.docx)

HRS DOCUMENTATION RECORD POINTS/ISSUES

Below is a bulleted list of either issues noted during production of the Jard Company, Inc. (Jard) HRS Documentation record or questions to be resolved in the forthcoming months prior to listing. This summary document is organized by section within the HRS Documentation Record.

Figures

- The region would appreciate feedback regarding the shape of the site as it has been drawn based on site sources, the ground water release, and documented contamination within the overburden aquifer and the surface water pathway.

References

- The region acknowledges that some of the Memorandum or Project Note references lack initials or signatures. We tried, but were unable to obtain this documentation from some note authors due to personnel changes, etc. What, if anything, more should we do?

Site Summary

- Previous discussions concerning polychlorinated biphenyls (PCBs) with Headquarters (HQ) personnel and/or contractors have concluded that congener analysis is helpful in some cases. This analysis was performed on a limited number of samples for each matrix (source, ground water, and sediment). This information was presented in passing in the site summary with the data validation memorandum as the reference. Is any other summary suggested when referencing this data or to be included along with the validation memo?

Source Characterization

- Source Number 1 was characterized as a contaminated soil source and therefore compared against background soil samples. Reference 78 presents a detailed comparison of background and soil/source samples. This comparison indicates that a few of the 10 background samples presented could be excluded. The region chose to present all of the background samples in this initial submittal in order to cover the range of natural matrix descriptions and to avoid bias in choosing which samples should be excluded. But we realize that 10 background samples is excessive. How would HQ suggest dealing with the large number of background samples presented? In addition, we would like to discuss sample similarity with respect to sample depth on source areas that have undergone a removal action or capping, as with portions of Source No. 1?

Ground Water Migration Pathway

- The region acknowledges that private names were used in portions of this section. This is based on the state's/contractor's use of the names to identify residential drinking water samples (i.e. the "Watson" sample) in the source documents cited. The region has only presented the names in reference to the actual samples collected and has used generic property designations in place of addresses whenever possible. The repeated use of private names by others is also seen in reference to the "Greene Pond". How would you suggest the region deal with the use of private names in cited source documents?
- The background drinking water sample was collected from a private well directly adjacent to the target well being scored. This background well provided the most similar sample based on collection date, method, analysis, well type/usage, etc., but is also in an area mapped as part of the PCB-contaminated ground water plume, and is located downgradient of site sources. Does this present any issues? Is the background sample presented a strong enough sample or should the

region try to look at possible alternatives such as ground water sample(s) collected from monitoring wells instead?

- The observed release presented in the Ground Water pathway is limited to Aroclor 1016, while only Aroclor 1242 has been identified in the recent Source samples. The region recognizes that only PCBs in general are listed in SCDM. Furthermore, the documentation record presents information regarding the documented use of both Aroclors 1242 and 1016 by the facility, and also presents some general information about the impacts of weathering and analytical interpretation on Aroclor identification. Is there additional or different information that the region should be presenting to bolster the case that Aroclor 1016 is attributable to the site?

Surface Water Migration Pathway – Ground Water to Surface Water Component

- The ground water to surface water component template indicates that the elevation of the bottom of the surface water body should be presented. Data collected previously at the site has indicated the surface elevation of the surface water. This is presented within the component description. In your opinion, will the data presented suffice or should additional data be collected (i.e. survey measurement data)? Please note that if additional data will be required, its collection will have to take place soon due to weather considerations, so we would appreciate your prompt review of this issue.
- The ground water to surface water component template indicates that the theta angle be calculated. Based on the Rule, it appears this information is only used in scoring the Drinking Water Threat. The region did not score the Drinking Water Threat and therefore excluded the calculation of the theta angle. Is this a correct assumption?
- The region has presented a Level II Concentrations table to indicate which samples are to be used in scoring the Level II Wetland frontage. A closer examination of all of the Target sections within the Pathway templates does not show a place for the Level II Concentrations. In your opinion, should these be presented in a table or referenced to earlier release tables acknowledging that either a comparison value does not exist or the sample concentration is below the applicable comparison standard?

Jard Company, Inc. – Response to Region 1 Questions
November 7, 2013

Figures
For Figure 2, CSC suggests that the Region use a black, dashed line to denote the estimated site perimeter, and ensure that the line is visible across its entire extent – including around Sources 1 and 2. Currently, the solid black line could be interpreted to suggest the site perimeter is known precisely, and the black line currently is not visible on the edges Sources 1 and 2.

References
For project notes, memos or teleconference records that support critical scoring factors, it is important that they be signed by the source of the information. Two such references are Reference 121 and Reference 12.

- For Reference 121, which supports the only ground water target, CSC suggests that the Region obtain the signature of Alan Watson.
- For Reference 12, which supports the only surface water target, CSC suggests that the Region obtain the signature of Julie Foley, the Vermont Department of Environmental Conservation District Wetlands Ecologist.

Site Summary
Regarding the congener analyses that the Region has cited in the Site Summary of the HRS documentation record, this data may be critical to support the observed release of the same substances to ground water and surface water. CSC requests a copy of the analyses, to review as part of the QA for the HRS site package. This will help CSC's understanding of the PCBs detected in site sources, ground water, and in the surface water pathway.

Source Characterization
CSC does not see any issue with having several (i.e., 10) background samples. Regarding sample similarity, CSC suggests that, as the Region discusses soil makeup and texture in the HRS documentation record, this sufficiently establishes sample similarity, regardless of some minor differences in sample depth.

Ground Water Migration Pathway

- To address the question of use of "private" names in the HRS documentation record, CSC suggests that in the documentation record, a naming/numbering system be used to conceal the identity of actual persons. To tie these back to the site references, a new reference can be created that would serve as a key to enable cross-referencing.

- Regarding background well P010, which is adjacent to the drinking water target well (P090), CSC suggests that the Region emphasize in the HRS documentation record that this well serves to support an overall background level of non-detect and demonstrate that PCBs are not ubiquitous in the vicinity of the site – thus, supporting a significant increase in PCBs, and not use it as part of the discussion to establish attribution of PCB contamination to the site sources.

- Regarding attribution of PCB congeners analyzed as Aroclor 1016 to the site, as mentioned above (Site Summary), CSC requests a copy of the congener analysis, to review as part of the QA for the HRS site package. This will add to an understanding of PCBs associated with site sources and observed releases in both the ground water pathway and surface water pathway. It may be necessary to identify an "unallocated source" of the PCB congeners analyzed as Aroclor 1016.

Surface Water Migration Pathway – Ground Water to Surface Water Component

- Regarding presenting the elevation of the bottom of the surface water body, CSC acknowledges that a measurement of the depth of Greene Pond would be useful, and that this information could be shown on a figure similar to Figure 7A, which currently shows only the surface and bottom elevation of Duck Pond and the adjacent ground water table. However, CSC does not feel that a special trip to the site only to measure surface and bottom elevation of Greene Pond is warranted.

- While the angle theta is used when scoring targets in all ground water surface water threats, calculating the angle theta is required only when scoring potential contamination, so CSC suggests that the Region not calculate the theta angle.

- Regarding a Level II concentrations table, CSC suggests keeping Table 34 in its current location, even though it duplicates information previously presented in Table 30. However, CSC agrees that there is not a specific call for it in the HRS template.